1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	BOIES SCHILLER FLEXNER LLP David Boies (admitted pro hac vice) 333 Main Street Armonk, NY 10504 Tel: (914) 749-8200 dboies@bsfllp.com Mark C. Mao, CA Bar No. 236165 Beko Reblitz-Richardson, CA Bar No. 238027 Erika Nyborg-Burch, CA Bar No. 342125 44 Montgomery St., 41st Floor San Francisco, CA 94104 Tel.: (415) 293-6800 mmao@bsfllp.com brichardson@bsfllp.com brichardson@bsfllp.com James Lee (admitted pro hac vice) Rossana Baeza (admitted pro hac vice) 100 SE 2nd St., 28th Floor Miami, FL 33131 Tel.: (305) 539-8400 jlee@bsfllp.com Alison L. Anderson, CA Bar No. 275334 725 S Figueroa St., 31st Floor Los Angeles, CA 90017 Tel.: (213) 995-5720 alanderson@bsfllp.com	SUSMAN GODFREY L.L.P. Bill Carmody (admitted pro hac vice) Shawn J. Rabin (admitted pro hac vice) Steven M. Shepard (admitted pro hac vice) Alexander Frawley (admitted pro hac vice) 1301 Avenue of the Americas, 32nd Floor New York, NY 10019 Tel.: (212) 336-8330 bcarmody@susmangodfrey.com srabin@susmangodfrey.com sshepard@susmangodfrey.com afrawley@susmangodfrey.com Amanda K. Bonn, CA Bar No. 270891 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel.: (310) 789-3100 abonn@susmangodfrey.com MORGAN & MORGAN John A. Yanchunis (admitted pro hac vice) Ryan J. McGee (admitted pro hac vice) Ryan J. McGee (admitted pro hac vice) Tampa, FL 33602 Tel.: (813) 223-5505 jyanchunis@forthepeople.com Michael F. Ram, CA Bar No. 104805 711 Van Ness Ave, Suite 500 San Francisco, CA 94102 Tel: (415) 358-6913 mram@forthepeople.com	
19			
20	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
21	CHASOM BROWN, WILLIAM BYATT,	Case No.: 4:20-cv-03664-YGR-SVK	
22	JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO	PLAINTIFFS' ADMINISTRATIVE	
23	individually and on behalf of all similarly situated,	MOTION TO CONSIDER WHETHER GOOGLE'S MATERIAL SHOULD BE	
24	Plaintiffs,	SEALED SEALED	
25	vs.	CIVIL L.R. 79-5	
26	GOOGLE LLC,		
27	Defendant.		
28			

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed.

Document or Portion of Document	Party Claiming	Basis for Sealing
Sought to Be Sealed	Confidentiality	
Portions highlighted in yellow of	Google	Contains Material Designated
Plaintiffs' Opposition to Google's		"Confidential" and/or "Highly
Motion for Leave		Confidential" by Google
		pursuant to the Protective
		Order
Entirety of Exhibit 1 to Mao Declaration	Google	Contains Material Designated
(June 20, 2023 Second Supplemental		"Confidential" and/or "Highly
Report of Plaintiffs' Expert Jonathan		Confidential" by Google
Hochman)		pursuant to the Protective
		Order

Under Civil Local Rule 79-5(f), Google, as the designating party, bears the burden of establishing that the designated material is sealable.

12	Dated: September 5, 2023	Respectfully submitted,
13		By: /s/Mark Mao
14		Mark C. Mao (CA Bar No. 236165)
15		mmao@bsfllp.com
16		Beko Reblitz-Richardson (CA Bar No. 238027) brichardson@bsfllp.com
17		Erika Nyborg-Burch (pro hac vice) Enyborg-burch@bsfllp.com
18		BOIES SCHILLER FLEXNER LLP
19		44 Montgomery Street, 41 st Floor San Francisco, CA 94104
20		Telephone: (415) 293 6858 Facsimile (415) 999 9695
21		James W. Lee (pro hac vice)
22		jlee@bsfllp.com
23		Rossana Baeza (pro hac vice) rbaeza@bsfllp.com
24		BOIES SCHILLER FLEXNER LLP 100 SE 2 nd Street, Suite 2800
		Miami, FL 33130 Telephone: (305) 539-8400
25		Facsimile: (305) 539-1304
26		Bill Carmody (<i>pro hac vice</i>) bcarmody@susmangodfrey.com
27		Shawn J. Rabin (<i>pro hac vice</i>)

1	srabin@susmangodfrey.com
1	Steven Shepard (pro hac vice)
2	sshepard@susmangodfrey.com
2	Alexander P. Frawley (pro hac vice)
3	afrawley@susmangodfrey.com SUSMAN GODFREY L.L.P.
4	1301 Avenue of the Americas, 32 nd Floor
_	New York, NY 10019
5	Telephone: (212) 336-8330
6	A 1 D (CA D N 270001)
7	Amanda Bonn (CA Bar No. 270891) abonn@susmangodfrey.com
,	SUSMAN GODFREY L.L.P.
8	1900 Avenue of the Stars, Suite 1400
9	Los Angeles, CA 90067
9	Telephone: (310) 789-3100
10	
11	John A. Yanchunis (pro hac vice)
11	jyanchunis@forthepeople.com Ryan J. McGee (<i>pro hac vice</i>)
12	rmcgee@forthepeople.com
12	MORGAN & MORGAN, P.A.
13	201 N Franklin Street, 7th Floor
14	Tampa, FL 33602
1.5	Telephone: (813) 223-5505
15	Facsimile: (813) 222-4736
16	Michael F. Ram, CA Bar No. 104805
17	MORGAN & MORGAN
1 /	711 Van Ness Ave, Suite 500
18	San Francisco, CA 94102
19	Tel: (415) 358-6913
19	mram@forthepeople.com
20	Attorneys for Plaintiffs
21	
21	
22	
23	
24	
25	
26	
27	
28	
7.8	